

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

IN RE KRAFT HEINZ  
SECURITIES LITIGATION

Case No. 1:19-cv-01339

Honorable Robert M. Dow Jr.

**JOINT MOTION FOR LEAVE TO FILE OVERSIZED BRIEFS**

Pursuant to Local Rule 7.1 of the Local Rules of the United States District Court for the Northern District of Illinois, Defendants The Kraft Heinz Company, Bernardo Hees, Paulo Basilio, David Knopf, Alexandre Behring, George Zoghbi, Rafael Oliveira, 3G Capital Partners, 3G Capital, Inc., 3G Global Food Holdings, L.P., 3G Global Food Holdings GP LP, 3G Capital Partners LP, 3G Capital Partners II LP, and 3G Capital Partners Ltd. (collectively, “Defendants”), and Lead Plaintiffs Union Asset Management Holding AG and Sjunde AP-Fonden, and additional named Plaintiff Booker Enterprises Pty Ltd. (“Plaintiffs,” and together with Defendants, “the Parties”), respectfully move this Court for leave to file oversized briefs regarding Defendants’ forthcoming motion to dismiss Plaintiffs’ complaint. In support of this joint motion, the Parties state as follows:

1. On January 6, 2020, Plaintiffs filed their Consolidated Class Action Complaint, which comprises 202 pages, 475 paragraphs, and 3 counts, and alleges that Defendants made misrepresentations over an approximately four-year period from 2015 to 2019. *See* Dkt. 179.
2. Per the Court’s order, Defendants’ motions to dismiss are due on March 6, 2020. *See* Dkt. 175.
3. To adequately and completely address all of the allegations in Plaintiffs’ voluminous complaint, Defendants respectfully request leave to file memoranda of law totaling up

to seventy-five pages in support of their motions to dismiss, in addition to an appendix chart compiling the alleged misstatements identified in the Consolidated Class Action Complaint along with a short description of why each alleged misstatement is inactionable. Although the Defendants will endeavor to coordinate their briefs and avoid duplicating their arguments, they anticipate that separate briefing may be required because different claims and allegations are directed to different Defendants, and some of the defenses that relate to a subset of the Defendants will have to be addressed individually.

4. Consistent with Defendants' request, Plaintiffs respectfully request leave to file memoranda of law totaling up to seventy-five pages to oppose Defendants' forthcoming motions to dismiss.

5. Likewise, Defendants respectfully request leave to file reply memoranda of law totaling up to forty pages.

6. The Parties respectfully submit that the additional pages beyond the limit allowed by Local Rule 7.1 are warranted in light of the length of Plaintiffs' complaint and the complexity of the issues, and that this will assist the Court in its consideration of Defendants' forthcoming motions to dismiss.

7. The parties are in agreement as to the relief sought by way of this motion.

WHEREFORE, the Parties respectfully request that this Court enter an Order allowing Defendants to file memoranda of law totaling up to seventy-five pages in support of their motions to dismiss; allowing Plaintiffs to file memoranda of law totaling up to seventy-five pages in opposition to Defendants' motions to dismiss; and allowing Plaintiffs to file reply memoranda of law totaling up to forty pages.

Dated: February 21, 2020

/s/Dean N. Panos

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Respectfully submitted,

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*Counsel for Co-Lead Plaintiff Union Asset Management Holding AG and Co-Lead Counsel for the Class*

**CERTIFICATE OF SERVICE**

I, Gabriel K. Gillett, an attorney, certify that on this 21st day of February, 2020, I caused a copy of the foregoing *Joint Motion For Leave To File Oversized Briefs* to be filed with the electronic filing system of the Northern District of Illinois, which will automatically serve all counsel of record.

/s/ Gabriel K. Gillett  
*Attorney for Defendants*